

NOTICE OF AMENDMENT

CERTIFIED - RETURN RECEIPT REQUESTED

November 24, 1997

Jim Clark
Superintendent, Pipeline O&M
Sacramento Municipal Utility District (SMUD)
6201 S. Street
Sacramento, CA 95817

CPF No. 57011M

Dear Mr. Clark:

On July 29-30, 1997, representatives of the Western Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of SMUD's Cogeneration Pipeline facilities and records located in Sacramento, California.

As a result of the inspection, it appears that you have committed probable violations as noted below of pipeline safety regulations Title 49, Code of Federal Regulations, Parts 192. The items inspected and probable violations are:

1. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (a) **General.** Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.
 - (b) **Maintenance and normal operations.** The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.

During the inspection, written procedures were not established for the following sections under subpart M:

§192.703	General.
§192.705	Transmission lines: Patrolling.
§192.706	Transmission lines: Leakage surveys.
§192.707	Line markers for mains and transmission lines.
§192.709	Transmission lines: Record keeping.
§192.711	Transmission lines: General requirements for repair procedures.
§192.713	Transmission lines: Permanent field repair of imperfections and damages.
§192.715	Transmission lines: Permanent field repair of welds.
§192.717	Transmission lines: Permanent field repair of leaks.
§192.719	Transmission lines: Testing of repairs.
§192.727	Abandonment or inactivation of facilities.
§192.739	Pressure limiting and regulating stations: Inspection and testing.
§192.743	Pressure limiting and regulating stations: Testing of relief devices.
§192.745	Valve maintenance: Transmission lines.
§192.751	Prevention of accidental ignition.

(2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.

During the inspection, written procedures for controlling corrosion were not established for the applicable sections under subpart I.

(3) Making construction records, maps, and operating history available to appropriate operating personnel.

During the inspection, written procedures were not established for making construction records, maps, and operating history available to operating personnel.

(8) Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found.

At the time of the inspection, written procedures for determining the effectiveness and adequacy of the procedures used in normal operations and maintenance were not established.

(9) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line.

No written procedures were established for taking adequate precautions for the unsafe accumulation of vapor or gas in excavated trenches.

(c) Abnormal operation. For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:

(1) Responding to, investigating, and correcting the cause of:

- (i) Unintended closure of valves or shutdowns;**
- (ii) Increase or decrease in pressure or flow rate outside normal operating limits;**
- (iii) Loss of communications;**
- (iv) Operation of any safety device; and,**
- (v) Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property.**

(2) Checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation.

(3) Notifying responsible operator personnel when notice of an abnormal operation is received.

(4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

At the time of the inspection, written procedures for abnormal operation were not established.

(e) Surveillance, emergency response, and accident investigation. The procedures required by §192.613(a), 192.615, and 192.617 must be included in the manual required by paragraph (a).

During the time of the inspection, written procedures for surveillance, emergency response, and accident investigation were not established.

2. §192.614 Damage prevention program.

a) Except for pipelines listed in paragraph (c) of this section, each operator of a buried pipeline shall carry out in accordance with this section a written program to prevent damage to that pipeline by excavation activities. For the purpose of this section, "excavation activities" include excavation, blasting, boring, tunneling, backfilling, the removal of above ground structures by either explosive or mechanical means, and other earth moving operations. An operator may perform any of the duties required by paragraph

(b) of this section through participation in a public service program, such as a "one-call" system, but such participation does not relieve the operator of responsibility for compliance with this section.

During the time of the inspection, no written procedures were established for a Damage Prevention Program.

Under 49 United States Code 60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violation persists up to a maximum of \$500,000 for any related series of violations.

When it is found that an operator's procedures are inadequate, 49 C.F. R. §190.237 provides that the operator, after notice and opportunity for hearing, may be required to amend its plans and procedures. This letter serves to provide you with the notice of the inadequate procedures and the response options as prescribed under §190.237. If you do not wish to contest this notice, please provide your revised procedures within 30 days of receipt of this notice.

Also enclosed, and made part of this Notice, is a description of the available procedures for responding to this Notice. Please note that if you elect to make a response, you must do so within 30 days of your receipt of this Notice or waive your rights under 49 CFR §190.209. No response or a response which does not contest the allegations in the Notice authorizes the Associate Administrator, OPS to find the facts to be as alleged herein and to issue appropriate orders.

The 30-day response period may be extended for good cause shown and submitted within the original 90 days.

Please refer to **CPF No. 57011M** in any correspondence/communication on this matter.

Sincerely,

Edward J. Ondak
Director

Enclosure